



California Regional Water Quality Control Board

Central Coast Region



Linda S. Adams
Secretary for
Environmental
Protection

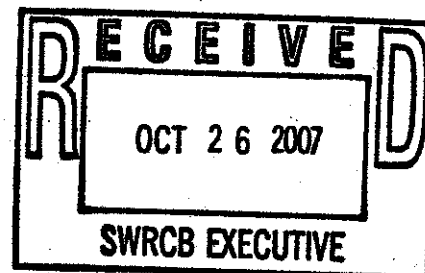
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Arnold Schwarzenegger
Governor

12/4/07 Bd. Mtg.
Water Recycling Policy
Deadline: 10/26/07 by Noon

October 26, 2007

Jeanine Townsend, Clerk to the Board
Executive Office
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



COMMENT LETTER – PROPOSED WATER RECYCLING POLICY

Thank you for this opportunity to comment on the proposed water recycling policy. Central Coast Water Board staff shares State Water Board's commitment to encourage water recycling. We appreciate the intent of the proposed policy, but we question its underlying assumption that Regional Water Board regulation is a major obstacle to development of new recycled water projects. In the course of regulating multiple recycled water projects, we have found that the real obstacles to new recycled water projects are the economics of Title 22 treatment, monitoring, and use requirements. The requirements of Title 22 will not be lessened by the restrictions on Regional Water Board regulation (e.g., salts control and groundwater monitoring) proposed in this policy. The Central Coast Water Board properly balances the need to develop recycled water projects and protect public health and water quality. We do not appreciate the proposed policy's new restrictions on our ability to protect water quality. We request the policy be sent back to staff to be rewritten with a proper balance between the need to develop additional recycled water projects and protect public health and water quality. If necessary, State Water Board staff should work with the California Department of Public Health on revisions to Title 22 to improve the economics of recycled water projects.

Should you decide to proceed with adoption of the policy at this time, we have one specific comment. Policy statement 7 states that the Regional Water Boards must require "the use of recycled water to not cause or contribute to violations of water quality objectives." Policy statement 8 then restricts the Regional Water Boards from monitoring groundwater unless "it determines that site conditions such as shallow groundwater could cause an increased potential for the irrigated site to adversely affect public health or surface water quality." The reference to "public health or surface water quality" would restrict the Regional Water Board's ability to monitor groundwater and determine if use of recycled water will cause or contribute to violations of water quality objectives. This contradicts policy statement 7. We therefore request this policy statement 8 be revised slightly as follows:

California Environmental Protection Agency



Recycled Paper

October 26, 2007

A Regional Water Board shall only require groundwater monitoring for a recycled water irrigation project if it determines that site conditions such as shallow groundwater could cause an increased potential for the irrigated site to adversely affect public health or surface water quality or contribute to violations of water quality objectives.

This revised language will send the message to the Regional Water Boards that groundwater monitoring should only be required where absolutely necessary, but will give the Regional Water Board adequate discretion to require groundwater monitoring where necessary. We believe this is a reasonable request and hope to see it incorporated in the final policy.

Thank you for your attention to these comments. If you have any questions, please contact Matt Thompson at (805) 549-3159 or Harvey Packard at (805) 542-4639.

Sincerely,



Roger W. Briggs
Executive Officer

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